

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

15 MISC 150

) GOOGLE INC.,

) CASE NO.: _____

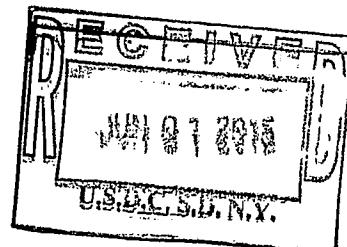
) Petitioner,

) CASE IN OTHER COURT:
No. 3:14-cv-00981-HTW-LRA (S.D.
Miss.)

) v.

) TWENTY-FIRST CENTURY FOX, INC.,
NBCUNIVERSAL MEDIA, INC., and
VIACOM, INC.,

) Respondents.



NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying (i) Memorandum of Law in Support of Google Inc.'s Rule 45 Motion to Compel Compliance with Subpoena, and (ii) Declaration of Michael H. Rubin and attached exhibits, Petitioner Google Inc., by and through their undersigned counsel, will and hereby do move this Court, at the United States District Court, 500 Pearl Street, New York, New York, 10007, on July 14, 2015 or as soon thereafter as the matter may be heard, for an Order, pursuant to Rule 45 of the Federal Rules of Civil Procedure, compelling Respondents to produce documents pursuant to subpoenas issued by Google Inc. out of the United States District Court for the Southern District of Mississippi.

This Motion is supported by the attached Memorandum, the accompanying Declaration of Michael Rubin and attached exhibits, a proposed order, any papers submitted in reply to any opposition to this Motion, facts of which this Court may take judicial notice, the record in the underlying action in the United States District Court for the Southern District of Mississippi,

Case No. 3:14-cv-00981-HTW-LRA, arguments of counsel if any, and any other matters as may properly come before this Court.

Dated: June 1, 2015

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: 
Morris J. Fodeman
1301 Avenue of the Americas, 40th Floor
New York, NY 10019
Email: mfodeman@wsgr.com
Phone: (212) 999-5800
Fax: (212) 999-5899

David H. Kramer (*pro hac vice* forthcoming)
Michael H. Rubin (*pro hac vice* forthcoming)
650 Page Mill Road
Palo Alto, CA 94304
Email: dkramer@wsgr.com
Email: mrubin@wsgr.com
Phone: (650) 496-9300
Fax: (650) 493-6811

Attorneys for Petitioner
GOOGLE INC.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GOOGLE INC.,)	CASE NO.: _____
)	
Petitioner,)	CASE IN OTHER COURT:
)	No. 3:14-cv-00981-HTW-LRA (S.D.
v.)	Miss.)
)	
TWENTY-FIRST CENTURY FOX, INC.,)	
NBCUNIVERSAL MEDIA, INC., and)	
VIACOM, INC.,)	
)	
Respondents.)	
)	
)	

CERTIFICATE OF SERVICE

I, Morris J. Fodeman, hereby certify that I caused a true and correct copy of the following to be filed and served this day as follows:

- MISCELLANEOUS CASE COVER SHEET;
- NOTICE OF MOTION TO COMPEL COMPLIANCE WITH SUBPOENA;
- MEMORANDUM OF LAW IN SUPPORT OF GOOGLE INC.'S RULE 45 MOTION TO COMPEL COMPLIANCE WITH SUBPOENA;
- DECLARATION OF MICHAEL H. RUBIN IN SUPPORT OF GOOGLE INC.'S RULE 45 MOTION TO COMPEL COMPLIANCE WITH SUBPOENA (with Exhibits 1-59); and
- [PROPOSED] ORDER.

Via Messenger

Clerk of the Court
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Via Electronic Mail

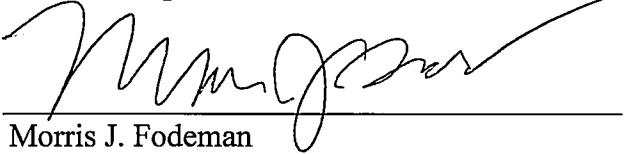
Scott B. Wilkens
JENNER & BLOCK LLP
1099 New York Avenue, NW
Suite 500
Washington, DC 20001
Phone: (202) 639-6072
Fax: (202) 661-4832
Email: swilkens@jenner.com

Dated: June 1, 2015

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By:


Morris J. Fodeman
1301 Avenue of the Americas, 40th Floor
New York, NY 10019
Email: mfodeman@wsgr.com
Phone: (212) 999-5800
Fax: (212) 999-5899

David H. Kramer (*pro hac vice* forthcoming)
Michael H. Rubin (*pro hac vice* forthcoming)
650 Page Mill Road
Palo Alto, CA 94304
Email: dkramer@wsgr.com
Email: mrubin@wsgr.com
Phone: (650) 496-9300
Fax: (650) 493-6811

Attorneys for Petitioner
GOOGLE INC.